

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

1) RAQUEL HOYT, F/K/A RAQUEL HOUSE,)
)
Plaintiffs,)
)
v.) Case No. _____
)
)
1) JOSEPH CHRISTIAN COOK, and) Removed from the District Court
2) C.R. ENGLAND, INC., a Foreign for Profit) of Tulsa County, Oklahoma
 Business Corporation,) Case No. CJ-2020-1566
)
Defendants.)

NOTICE OF REMOVAL

1. C.R. England, Inc. (“CRE”) is a defendant in a civil suit brought against it in the District Court of Tulsa County, State of Oklahoma, titled *Raquel Hoyt, f/k/a Raquel House v. Joseph Christian Cook and C.R. England, Inc.*, Case No. CJ-2020-1566.
2. Defendant, CRE, was served on June 21, 2021. Therefore, this Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b) as it is filed within 30 days of service of process upon them.
3. Plaintiff alleges that they are entitled to damages in excess of \$75,000 for the claims set forth in his Petition.
4. The Plaintiff is a resident of Elkhart County, Indiana.
5. Defendant, CRE, is a Corporation formed under the laws of the State of Utah.
6. Upon information and belief, Defendant, Joseph Christian Cook, is a resident of Denton County, Texas.

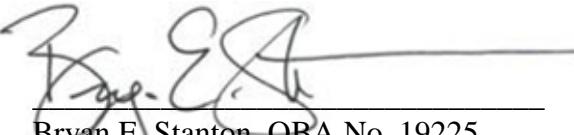
7. Pursuant to 28 U.S.C §§ 1332 and 1441, Defendant removes this action to the United States District Court for the Northern District of Oklahoma as complete diversity of citizenship exists between Plaintiff and Defendants. The amount in controversy exceeds \$75,000.00, exclusive of interest and costs.
8. Copies of all process, pleadings, and orders filed or served upon Defendant in the aforementioned state court action are attached hereto as follows, and made a part hereof:
 - (a) Exhibit 1 – State Court Docket Sheet;
 - (b) Exhibit 2 – Plaintiff’s Petition filed May 12, 2020;
 - (c) Exhibit 3 – Summons issued to Defendant C.R. England, Inc. on May 12, 2020;
 - (d) Exhibit 4 – Plaintiff’s First Motion for Order Enlarging Time to Procure Service filed October 13, 2020;
 - (e) Exhibit 5 – First Order Enlarging Time to Procure Service filed October 16, 2020;
 - (f) Exhibit 6 – Notice of Impending Dismissal for Failure to Obtain Service Within 180 Days filed November 9, 2020;
 - (g) Exhibit 7 – Plaintiff’s Second Motion for Order Enlarging Time to Procure Service filed April 22, 2021;
 - (h) Exhibit 8 – Second Order Enlarging Time to Procure Service filed April 27, 2021;
 - (i) Exhibit 9 – Affidavit of Service as to Defendant C.R. England, Inc. filed on June 29, 2021.
9. Written notice of the filing of this Notice of Removal will be promptly provided to Plaintiff’s counsel via regular mail. Also, a copy of this Notice of Removal

will be filed with the clerk of the District Court of Tulsa County, state of Oklahoma, as provided by 28 U.S.C. § 1446(d).

10. Defendant respectfully reserves its right to file all appropriate motions and raise all defenses and objections in this action after it has been properly removed to the United States District Court for the Northern District of Oklahoma.

WHEREFORE, Defendant, C.R. England, Inc., removes this action to this Court, invoking this Court's jurisdiction.

JURY TRIAL DEMANDED.

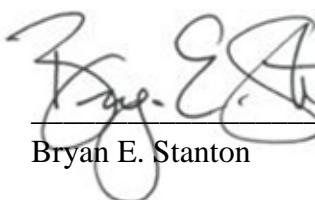


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Attorneys for Defendant, C.R. England, Inc.

CERTIFICATE OF SERVICE

This is to certify that on the 20th day of July 2021, a true and correct copy of the above and foregoing was sent via first class mail, postage prepaid, to the following:

Daniel B. Graves
William C. McClain
Rachel E. Gusman
Tiffany L. Landry
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